

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND and IMANI CLARK,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**PLAINTIFF-INTERVENORS THE TEXAS LEAGUE OF YOUNG
VOTERS EDUCATION FUND AND IMANI CLARK'S
DESIGNATION OF EXPERT WITNESSES**

The Texas League of Young Voters Education Fund and Imani Clark hereby make this expert witness designation as required by Federal Rule of Civil Procedure 26(a)(2) and this Court's Amended Scheduling Order (ECF No. 231).

The following persons may be used to present evidence at trial under Federal Rules of Evidence 702, 703, or 705:

1. Coleman Bazon
The Brattle Group
1850 M Street NW
Suite 1200
Washington, DC 20036
Coleman.Bazon@brattle.com
202.955.5050

Dr. Bazelon's report, curriculum vitae, and testifying history are attached hereto as Exhibit A. Dr. Bazelon may be called to testify regarding the economic burden that Senate Bill 14 imposes on Texas voters, whether that burden varies depending on a voter's race, and any other subjects or opinions referenced in his report or in subsequent deposition testimony, including reasonable inferences arising therein.

2. Vernon Burton
 126 Hardin Hall, Box 340527
 Clemson University
 Clemson, SC 29634-0527
 vburton@clemson.edu
 864.656.7136

Dr. Burton's report, curriculum vitae, and testifying history are attached hereto as Exhibit B. Dr. Burton may be called to testify about racial discrimination in Texas, the interaction between Senate Bill 14 and social and historical conditions in Texas, and any other subjects or opinions referenced in his report or in subsequent deposition testimony, including reasonable inferences arising therein.

Respectfully submitted this 27th day of June 2014.

/s/ Ryan P. Haygood

Ryan P. Haygood

Christina A. Swarns

Natasha M. Korgaonkar

Leah C. Aden

Deuel Ross

NAACP Legal Defense and Educational Fund, Inc.

40 Rector Street, 5th Floor

New York, New York 10006

cswarns@naacpldf.org

rhaygood@naacpldf.org

nkorgaonkar@naacpldf.org

laden@naacpldf.org

dross@naacpldf.org

Danielle Conley

Kelly P. Dunbar

Jonathan Paikin

WILMER CUTLER PICKERING HALE

AND DORR LLP

1875 Pennsylvania Avenue

Washington, DC 20009

202-663-6262

kelly.dunbar@wilmerhale.com

danielle.conley@wilmerhale.com

jonathan.paikin@wilmerhale.com

Counsel for Plaintiff-Intervenors Texas League of Young Voters Education Fund & Imani Clark

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2014, I filed a true and correct copy of the foregoing document with the Clerk of court using the CM/ECF system, which will send a notice of the electronic filing to all counsel of record.

/s/ Ryan P. Haygood